

ADAM PAUL LAXALT
Nevada Attorney General
MERCEDEZ S. MENDENDEZ
Deputy Attorney General
Nevada Bar No. 9443
CAROLINE BATEMAN
Deputy Attorney General
Nevada Bar No. 12281
Bureau of Litigation
Public Safety Division
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101
Telephone: (702) 486-2625
Facsimile: (702) 486-3773
Email: cbateman@ag.nv.gov
Attorneys for Defendants
Robert Bannister, Joseph Hanson,
Linda Adams, and Doni K. Jennings

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KENNETH FRIEDMAN, #80952

Plaintiff,

vs.

LINDA ADAMS, et al.,

Defendants.

CASE NO.: 2:13-cv-01345-JCM-CWH

**DEFENDANTS' MOTION FOR
ENLARGEMENT OF TIME TO
RESPOND TO PLAINTIFF'S MOTIONS
UNDER DKT. NUMBERS 35-37
(FIRST REQUEST)**

Defendants Robert Bannister, Joseph Hanson, Linda Adams and Doni K. Jennings, by and through counsel, ADAM PAUL LAXALT, Attorney General of the State of Nevada, and CAROLINE BATEMAN, Deputy Attorney General, hereby move for an enlargement of time for

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the filing of their responses to Plaintiff's Motions under Dkt. Numbers 35-37 pursuant to Local Rule 6-1.

DATED this 22nd day of June, 2015

Respectfully submitted,

ADAM PAUL LAXALT
Nevada Attorney General

By: /s/ Caroline Bateman
CAROLINE BATEMAN
Deputy Attorney General
Attorneys for Defendants
Robert Bannister, Joseph Hanson,
Linda Adams, and Doni K. Jennings

MEMORANDUM OF POINTS AND AUTHORITIES

I. PROCEDURAL HISTORY

This is a *pro se* civil rights action filed by Plaintiff Kenneth Friedman ("Plaintiff"), who is an inmate in the custody of the Nevada Department of Corrections. On June 3, 2015, Plaintiff filed the following motions: Plaintiff's Second Motion to Compel Discovery (Dkt. #35); Plaintiff's Motion for Sanctions regarding Discovery (Dkt. #36); and Plaintiff's Motion to Extend Discovery (Dkt. #37). Defendants now move for an enlargement of time of five (5) days to respond to Plaintiff's Motion to Compel, Motion for Sanctions, and Motion to Extend Discovery.

II. LEGAL ANALYSIS

The Court has broad discretion in supervising the pretrial phase of litigation. See *Zivkovic v. S. Cal. Edison Co.*, 302 F.3d 1080, 1087 (9th Cir. 2002). Under LR 6-1, a motion for extension of time must state the reasons for the extension requested and inform the Court of any previous extensions granted.

Defendants respectfully request that this Court find that they have demonstrated good cause for their first requested extension to respond to Plaintiff's Motions under Dkt. Numbers 35-37. Undersigned counsel for Defendants recently took over the representation of this case

1 from prior counsel. As the contents of Plaintiff's motions concern discovery that was
2 completed by prior counsel, as well as conversations between Plaintiff and prior counsel,
3 Defendants request an enlargement of time so that current counsel can confer with prior
4 counsel and provide accurate responses to Plaintiff's motions.

5 As such, Defendants' counsel respectfully requests the deadline for responses to Dkts.
6 35-37 be continued for a period of five (5) days.

7 **III. CONCLUSION**

8 Based on the foregoing, Defendants respectfully request an extension of five (5) days
9 to file their responses to Plaintiff's Motions under Dkt. Numbers 35-37.

10 DATED this 22nd day of June, 2015

11 Respectfully submitted,

12 ADAM PAUL LAXALT
13 Nevada Attorney General

14 By: /s/ Caroline Bateman
15 CAROLINE BATEMAN
16 Deputy Attorney General
17 *Attorneys for Defendants*
18 *Robert Bannister, Joseph Hanson,*
Linda Adams, and Doni K. Jennings

19 **ORDER**

20 IT IS SO ORDERED.

21 DATED: June 23, 2015

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23 _____
24 United States Magistrate Judge
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on the 22nd day of June, 2015, I served the foregoing, **DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO PLAINTIFF'S MOTIONS UNDER DKT. NUMBERS 35-37 (FIRST REQUEST)**, by causing a true and correct copy thereof to be filed with the Clerk of the Court, using the electronic filing system, and by causing a true and correct copy thereof to be delivered to the Department of General Services, for mailing at Las Vegas, Nevada, addressed to the following:

Martinez S. Aytch #54102
Lovelock Correctional Center
1200 Prison Road
Lovelock, Nevada 89419
Plaintiff, Pro Se

/s/ Carol A. Knight

CAROL A. KNIGHT
An employee of:
STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL